

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 EASTERN DIVISION

4 RAUL NOVOA, *et al.*,

5 *Plaintiffs,*

6 v.

7 THE GEO GROUP, INC.,

8 *Defendant.*

Civil Action No. 5:17-cv-02514

9 **DECLARATION OF ABDIAZIZ KARIM**

10 I, ABDIAZIZ KARIM, declare as follows:

11 1. I am over the age of eighteen, competent to testify in this matter, and do
12 so based on personal knowledge.

13 2. I am a citizen of Somalia and am seeking asylum in the United States.

14 3. I entered the Adelanto ICE Processing Center (the "Adelanto Facility")
15 as a civil immigration detainee on or around August 22, 2017 and am currently
16 detained there.

17 4. Defendant The GEO Group, Inc. ("GEO") issued me a "Detainee
18 Handbook" when I entered the Adelanto Facility.

19 5. I learned about the Work Program upon my entry to the Adelanto
20 Facility and requested to take part in the program.

1 6. I currently work as a porter in the Work Program. As a porter, I work in
2 a five to seven-person crew to clean windows, floors, showers, and communal areas in
3 the Adelanto Facility. I work up to seven days per week. I have worked as a porter
4 since approximately September 2017.

5 7. I am currently paid \$1.00 per day for my labor as a porter. However, I
6 was not paid at all during my first three months on the job. During that period, GEO
7 officials required me to work for free before I would be hired into the Work Program.
8 Similarly, I was not paid for my labor as a porter from approximately mid-May through
9 July of 2018. During those months, GEO officials again required me to work without
10 compensation.

11 8. I have also worked in the kitchen at the Adelanto Facility. As a food
12 service worker, I prepared food, served meals, cleaned the kitchen and dining halls,
13 and washed dishes. I worked from approximately 2:00 a.m. until 8:00 a.m., up to seven
14 days per week, for about one month.

15 9. I was not paid during my first three weeks as a kitchen worker. I was told
16 by GEO officials that I had to work for free before I would be paid through the Work
17 Program. I was paid \$1.00 ^{total for} ~~per day for the last few days of~~ my employment in the
18 kitchen. AK

19 10. On multiple occasions, GEO officials have instructed me and several
20 other detainees to clean various areas of the Adelanto Facility, including hallways, the
21 visitation area, the kitchen, and the yard. I have never been compensated for this labor.

1 11. GEO officials routinely require detainees to clean the common spaces
2 and showers of my housing unit for no compensation. If we refuse, GEO officials turn
3 off the TV and the Xbox, prohibit detainees from using the telephones or the showers,
4 and evacuate the day room. When this happens, detainees must remain in their cells
5 until a detainee volunteers to complete the sanitation and cleaning tasks that GEO has
6 required.

7 12. GEO officers have threatened to take disciplinary action against me for
8 refusing to clean areas of the Adelanto Facility for free.

9 13. From my review of the Detainee Handbook, I understand that detainees
10 who disobey GEO officials or refuse to clean can be subject to disciplinary action,
11 including solitary confinement.

12 14. GEO supervises and controls all aspects of my work. GEO provides me
13 with the training, safety equipment, and tools I needed to perform my jobs at the
14 Adelanto Facility. GEO required me to submit applications for my jobs as a porter and
15 food service worker. GEO also required me to sign various documents when I first
16 began those jobs.

17 15. Because of my detainee status, GEO did not permit me to seek
18 employment from another employer outside the walls of the Adelanto Facility.

19 16. Regardless of how many hours I work in a day or week, GEO pays me
20 only \$1.00 per day, or nothing at all. I do not earn minimum wage for the work I
21 perform at the Adelanto Facility for GEO.

1 17. I participate in the Work Program in order to buy daily necessities that
2 GEO fails to provide for me. I rely on my wages to buy food and personal hygiene
3 items from commissary. I fear that if I stop participating in the Work Program, I will
4 not have access to those necessities.

5 18. To the best of my knowledge, hundreds of detainees, if not more, take
6 part in the Work Program. I believe that other detainees performed similar work
7 assignments, as well as jobs in laundry, the barbershop, and other cleaning and
8 maintenance type jobs. I am not aware of any detainee receiving more than \$1.00 per
9 day for participating in the Work Program.

10 19. I understand that I am bringing this case on behalf of all current and
11 former detainees at the Adelanto Facility, not just myself.

12 20. I understand the responsibilities involved in being both a plaintiff and a
13 class representative in this lawsuit. I am prepared to cooperate with my counsel and
14 meet all of my duties and obligations to make sure this lawsuit is pursued in the best
15 interest of myself and all other current and former participants in the Work Program at
16 the Adelanto Facility. I understand that means that I may be required to have my
17 deposition taken by GEO's lawyers and respond to other discovery.

18 21. I am prepared to help prepare for and attend trial, to testify, and assist my
19 attorneys as needed and to continue to participate actively in the direction of this case.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct and based on my personal knowledge.

3
4 Executed in Adelanto, California, on July 26, 2019.

5 

6 Abdiaziz Karim, Plaintiff